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December 21, 2004

Mr. John J. Czerwinski, Bus. Mgr.  
Plumbers & Pipefitters Local Union #74  
18 Boulden Circle, Suite #18  
New Castle, DE 19720

Re: Request for Union Local #74 Membership data;  
Representation of Estate of Russell B. Toy benefits;  
Ms. Martha Jane Toy survivor benefits

Dear Mr. Czerwinski:

This letter is a request for general information as to the Union's employment site locations, location of recipients of benefits based on the residential locations of Union membership and contributions made to the Union's Funds based on location. Ms. Toy has suggested that such general information might be available through your office such that it would not include any specific dollar information, but could profile members' Pennsylvania residential locations, where major employment sites are located in Pennsylvania, and how many retirees live in Pennsylvania and receive pension and/or welfare plan benefits.

Specifically, could your records indicate a representative list of, say, ten sites for employment assignment through the Union such that it would include sites from which employer contributions are made to Local #74? By way of example, I am aware of Dravo Corp., Pittsburgh, PA, American Industrial Contracting, Sewickley, PA, and H. A. Diffenbach, Inc., Folsom, PA. If you could supplement this list with ten other employers, it would aid Ms. Toy.

We also would appreciate any general profile of the residential locations of pension benefit recipients. We are understandably not interested in dollar amounts of payments of pension and/or welfare benefits since this is privileged information. We are interested, however, in how many Union Local #74 pensioners live in Pennsylvania who may be receiving benefits without specifying residential addresses or other personal data.

EXHIBIT A

JOHN M. STULL, ESQ.

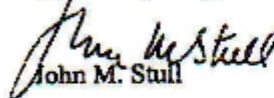
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As a final request, we would be interested to know how many members of Union Local #74 who have active, on-going employment live in Pennsylvania. Again, this is not to seek any privileged data, but is information to show the strength of Union Local #74's presence in Pennsylvania. If I can clarify any or all of these requests, or if there is a problem in obtaining such information, please contact the writer. Thank you for any consideration you can give to these requests.

Yours very truly,

  
John M. Stull

JMS/prs

cc: Ms. Martha Jane Toy

